

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

LIDDLE & ROBINSON, L.L.P.,

Debtor.

Chapter 11

Case No. 19-12346 (PB)

NOTICE OF MOTION

MOTION BY:

Effat S. Emamian

PLACE, DATE AND

TIME OF MOTION:

United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10014, Courtroom of Hon. Philip Bentley, except if the hearing is conducted remotely, on December 1, 2023, at 2023 at 11:00 a.m.

RELIEF SOUGHT:

Orders: (a) pursuant to 11 U.S.C. § 362(d)(1) and Bankruptcy Rule 4001(a), granting relief from the Plan Injunction and automatic stay in the above-referenced proceeding so the action: *Effat S. Emamian v. Liddle & Robinson, L.L.P., et al.*, Index No. 153144/2014, can proceed; (b) waiving the stay imposed by Bankruptcy Rule 4001(a)(3), when the Court grants relief from the automatic stay, so the stay relief under 11 U.S.C. § 362(d)(1) is effective immediately; and (c) granting such other and further relief as the Court deems proper (the “Motion”).

SUPPORTING PAPERS: Motion for an Order granting relief from the Plan Injunction and automatic stay, pursuant to 11 U.S.C. § 362(a)(1), and Declaration of Scott E. Reynolds, Esq. In Support of Motion.

OPPOSING PAPERS: If any, are required to be delivered to the undersigned and filed with the Court not later than one week before the return date of this Motion.

Dated: October 27, 2023
Far Hills, NJ

REYNOLDS LAW GROUP LLC

By: /S/ Scott E. Reynolds
SCOTT E. REYNOLDS
REYNOLDS LAW GROUP LLC
43 Route 202, Suite 201
Far Hills, NJ 07931
(908) 367-9060
sreynolds@reynolds-lawgroup.com
Attorneys for Movant,
Effat S. Emamian